## REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of November 19, 2008 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due. However, the Examiner is expressly authorized to charge any deficiencies to Deposit Account No. 50-0951.

## Claims Rejections – 35 USC § 103

Claims 1-2 and 4-6 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Published Patent Application 2004/0003041 to Moore, *et al.* (hereinafter Moore) in view of U.S. Patent 7,058,036 to Yu, *et al.* (hereinafter Yu).

Applicants respectfully disagree with the rejections and thus have not amended the claims to overcome the art rejections. However, the language of Claim 1 has been slightly modified to even more clearly define the present invention.

### *Aspects of Applicants' Invention*

It may be helpful to reiterate certain aspects of Applicants' invention prior to addressing the cited references. One embodiment of the invention, as typified by amended Claim 1, is a method for bridging an existing teleconferencing system and an existing instant messaging system.

The method can include providing a speech processing device serving as a bridge between the teleconferencing system and the messaging system. The speech processing device can be directly coupled between the teleconferencing system and the instant messaging system or coupled between the teleconferencing system and the instant messaging system via a data network. The speech processing device can be configured to convert a speech input into a text message or a text message into a speech output.

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The method also can include receiving at the speech processing device a speech input received by the teleconferencing system from a telephone connected to the teleconferencing system; transcribing the speech input to a first text message by the speech processing device; and transmitting the first text message to a plurality of instant messaging devices participating in an instant messaging based conference managed by the instant messaging system.

The method further can include receiving at the speech processing device a second text message from any one among the plurality of instant messaging devices participating in the instant messaging based conference; converting the second text message to a speech output; and transmitting the speech output to a plurality of telephones participating in a teleconference managed by the teleconferencing system.

See, e.g., Specification, paragraphs [0013]-[0018]; see also Figs. 1 and 2.

## The Claims Define Over The Prior Art

Conferencing using text-based instant messaging (IM) applications is frequently used as a means of collaboration among home users as well as among enterprises. Unfortunately, not everybody has access or is connected to a LAN or the Internet to participate in such text conferences. Mobile people and computer adverse people may not have access to a networked computer and keyboard to participate in an IM-based conference. Many of these users, while not connected, would still like to participate in an IM conference in a manner that is seamless and familiar to them. See Specification, paragraph [0002].

Several systems attempt to bridge the gap between voice conferencing and instant messaging system, but such existing systems usually have limitations that prevent a truly user friendly experience in a real-time environment. For example, U.S. Patent No. 6,430,604 describes a method of delivering instant messages using cell phones and text

pagers but using only text entry. Another patent, WO0135615A2, discusses a method of extending an IM system to telephone messaging systems where a user can log into their voice messaging system to communicate with users on their buddy list. See Specification, paragraph [0003].

Examples of known systems using text-to-speech and speech-to-text include U.S. Patent Publication US2002/0069069 A1, where such system focuses on communications between participants that can and cannot hear voice conversations, or U.S. Patent No. 6,339,754 B1, where text-to-speech and speech-to-text technologies coupled with language translation enable chat and voice conferencing, or U.S. Patent Nos. 6,385,586 B1 or 6,292,769 B1, where text-to-speech and speech-to-text technologies are used to improve language translation between two or more spoken (different language) communications. See Specification, paragraph [0004].

Although there are numerous systems using text-to-speech and speech-to-text technologies, none are ideally suited for augmenting voice (and text) chat over data transmission protocols, wherein such protocols can include chat/instant messaging (IM) and messaging protocols such as SMS. None of the existing systems provide a method of delivering voice messages to the intended recipient in the native format of the recipient's device in the language understood by the recipient while also providing a real-time collaboration system that does not necessarily require a voice messaging system to gain access to a conference. Thus, a need exists for a system and method that can overcome the detriments described above. See Specification, paragraph [0005].

The present invention provides a new technique for enhancing a real-time chat channel to enable telephone users to participate in a instant messaging conference. In a first aspect of the invention, a method for enabling phone users to participate in an instant messaging based conference can include the steps of receiving a speech input from a telephone through a teleconferencing system, transcribing the speech input to a first text

message and transmitting the first text message to a plurality of devices coupled to an instant messaging network belonging to the instant messaging based conference. The method can further include the steps of receiving a second text message from any one among the plurality of devices on the instant messaging based conference, converting the second text message to a speech output, and transmitting the speech output to the telephone via the teleconferencing system. See Specification, paragraph [0006]-[0007].

Moore discloses a method that provides access to services, such as directory assistance, through a textual instant communications, such as an instant messaging or so-called "chat" session. An entity such as a commercial service provider may provide information or may otherwise be able to provide services through an instant messaging or short messaging interaction. Using a chat client application of some type parties needing such services or information establish instant communications with the service providing entity. See paragraph [0024]. One advantage of employing this approach, rather than making a telephone call to a directory assistance agent, is that the desired information is returned to the computer system in a textual format which may be readily copied and "pasted" into a word processing document, database or other application running on the computer system. By receiving and entering the information in entirely electronic form, the user is saved considerable time and effort as compared to obtaining the desired information from a directory assistance agent in audio format and then manually entering the information into the computer system. The reduction in time and effort is particularly significant when the information comprises lengthy data, such as a complete mailing address and/or secondary contact information (e.g., mobile telephone number, fax number, e-mail address, website URL). See paragraph [0022].

FIG. 1 of Moore illustrates a communication system that provides chat-based services. The communication system 10 includes a data processing system 12 coupled by a communications network 20 to a service provider system 30 that provides chat-based

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services. The data processing system 12 may comprise any of a desktop personal computer system, laptop or handheld computer system, personal digital assistant (PDA), mobile telephone, television set-top box, or other existing or later known or developed electronic device that supports the communication with the network 20. The data processing system 12 may execute a chat client 14 as an application. The chat client 14 is a form of instant communications client that supports real-time or substantially real-time instant messaging communication. Using the chat client 14, a user may communicate with one or more other users accessible through the network 20 from an IP telephone 92 or a conventional telephone 62. See paragraphs [0074] and [0075]. It is noted that in FIG. 1 of Moore, the services (such as directory assistance) provided by the service provider system 30 can be conventionally accessed by telephones (such as traditional telephone 62 or IP telephone 92) and by the data processing system 12 through instant messaging.

As can be clearly seen from the above, the subject matter of Moore which concerns a method of accessing to services, such as directory assistance, through instant messaging communications, has nothing to do with the subject matter of the present invention which concerns a method of bridging an existing instant messaging system and an existing teleconference system using a speech processing device.

Moore mentions in paragraph [0087] that the services provided by the service provider system 30 may include conference call establishment. However, it is noted that the ability to establish a conference call does not make the service provider system 30 into a teleconferencing system, especially not an existing teleconferencing system. The telephone 62 is connected to the PSTN 60 (all traditional telephones are connected to the PSTN), but not to a teleconferencing system as in the present invention.

It was asserted in the Office Action that the intelligent chat gateway 52 does more than serve only as an interface between the instant messaging service provider system

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and the gateway system 50. The gateway system 50 includes a VoIP gateway 54, so that the IP telephone 92 can place a telephone call to the conventional telephone 62 through the PSTN 60. Similarly, a telephone call from the telephone 62 could be routed through the PSTN 60 and the gateway system 50 onto a billing system 42, and to an automated respondent 36 or a human respondent 34 of the service provider system 30.

However, it is noted that similarly to the service provider system 30 as discussed above, the ability of the VoIP gateway 54 to route telephone calls between an IP telephone and a conventional telephone does not make the intelligent chat gateway 52 or the gateway system 50 into a teleconferencing system, especially not an existing teleconferencing system.

Yu does not make up for the deficiencies of Moore as discussed above.

Accordingly, the cited references, alone or in combination, fail to disclose or suggest each and every element of Claim 1. Applicants therefore respectfully submit that Claim 1 defines over the prior art. Furthermore, as each of the remaining claims depends from Claim 1 while reciting additional features, Applicants further respectfully submit that the remaining claims likewise define over the prior art.

Applicants thus respectfully request that the claim rejections under 35 U.S.C. § 103 be withdrawn.

## CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the

Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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